

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA :**

**v. : CRIMINAL NO. 20-231**

**JOSEPH LAFORTE :**

**DEFENDANT JOSEPH LAFORTE'S SUPPLEMENTAL MEMORANDUM  
IN SUPPORT OF HIS MOTION FOR PRETRIAL RELEASE**

This will serve as a brief supplement to Mr. LaForte's prior submissions to this Court in support of his motion for pretrial release.

Two additional pieces of information bear noting. First, Mr. LaForte has a history of compliance with court ordered pretrial release. Mr. LaForte was on bail for 14 months in connection with his prior 2004 New York State Supreme Court case where he faced 8 ½ to 25 years in prison if convicted of all charges. Even though a modest bond and no restrictive conditions were imposed in connection with that matter, Mr. LaForte appeared at all scheduled court appearances and was ultimately permitted to voluntarily surrender for the service of the sentence imposed. The bail package offered to secure Mr. LaForte's release before this Court is far more restrictive and substantial, even though he is facing a mere fraction of the prison time if convicted - an advisory guideline prison range of

46-57 months.<sup>1</sup>

Second, new information bearing on the credibility of the so-called evidence that Mr. LaForte purportedly threatened merchant debtors, including threatening to blow up their houses, has come to light. Attached hereto for the Court's review is a copy of the Incident Report made by the accuser to police on May 23, 2019. It bears noting that the accusation was first reported to the authorities a full 17 days after the accuser claimed to have been threatened. The accusation was only made *after* the attorneys for Mr. LaForte's company, PAR Funding, d/b/a CBSG, had entered a near \$12 million judgment against the accuser on May 14, 2019. While purported threats to merchant debtors are not relevant to the bail determination (see e.g., footnote 4 to reply in support of motion for pretrial release), it is notable that the individual who made this accusation had 12 million reasons to lie.

It also bears noting that just a few months earlier, in a gift of "gratitude" penned personally for Mr. LaForte on his birthday by this so-called accuser, she was effusive in her praise of Mr. LaForte and his company. Her glowing assessment was as follows:

For your birthday HMC wanted to give you the gift of gratitude.

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<sup>1</sup> The government's estimate of 51-63 months appears to be based on a miscalculation of Mr. LaForte's criminal history category - which is criminal history category II.

The pages that follow are a collection of projects HMC completed in 2018. You and everyone at CBSG [PAR Funding] have played an integral role in HMC's success.

Please consider this book as a show of gratitude from me and everyone at HMC. We look forward to building more success in 2019.

*YOU'RE A WHOLE LOT OF LOVELY*

Attached hereto for the Court's review is a copy of the "Collection of Gratitude" provided to Mr. LaForte by this merchant debtor.

Dated: Philadelphia, Pennsylvania  
October 5, 2020

Respectfully submitted,

/s/

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BRIAN J. MCMONAGLE  
MMCMONAGLE PERRIR MCHUGH  
& MISCHAK  
1845 Walnut Street, 19<sup>th</sup> floor  
Philadelphia, PA 19103  
(215) 981-0999  
[bmcmonagle@mpmpc.com](mailto:bmcmonagle@mpmpc.com)

/s/

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MICHAEL J. ENGLE  
BUCHANAN INGERSOLL ROONEY  
50 South 15<sup>th</sup> Street, Suite 3200  
Philadelphia, PA 19102

(215) 665-3508  
michael.engle@bipe.com

/s/

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JAMES R. FROCCARO, JR.  
20 Vandeventer Avenue, Suite 103W  
Port Washington, NY 11050  
(516) 944-5062  
jrfesq61@aol.com

*Attorneys for Defendant Joseph LaForte*

He30926

RS

3/13/20

opl. 8327

3/13/2020

YEAR	DIST/OCC.	D.C.	SECT.	DIST.	VEH. NO.	REPORT DATE
19	06	12	3953	26	WF	5-23-19
CRIME OR INCIDENT CLASSIFICATION			CODE	TIME OUT	A	TIME IN
PROHIBITIVE			Threats	4:00	(P)	P
LOCATION OF OCCURRENCE				<input type="checkbox"/> IN	TYPE OF PREM.	
205 Arch St.				<input type="checkbox"/> OUT	053	
DATE OF OCCUR.		DAY CODE	TIME OF OCCUR.	A	NATURE OF INJURY	
5-6-19			2:00	(P)	—	
COMPLAINANT			AGE	RACE	SEX	PHONE (HOME)
Kara Anne D'Amato					W/F	
ADDRESS			PHONE (BUSINESS)			
FOUNDED		REPORT TO FD	OW	UNIT	CODE	INV. CONT NO.
<input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Close Out		
WITNESS		TRACEABLE PR	P	UNIQUE DESCRIPTION OF OFFENDER		OTHER EVIDENCE
<input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
DESCRIPTION OF INCIDENT (Include Description of Crime Scene if Applicable)						
<p>Compl. states after a business meeting with below offender on abv date and time the below threatened to blow up Compl's house.</p> <p>Compl. states there is an ongoing dispute involving her business.</p>						
WITNESS		ADDRESS	PHONE NUMBER			
Josh Persing						
OFFENDER INFORMATION		"Joe LaForte" "Joe Mac"				
PROPERTY DESCRIPTION (Include Model, Color and Serial No. Where Applicable)		Make	PROP. CODE	INSURED	STOLEN VALUE	
				<input type="checkbox"/> Yes <input type="checkbox"/> No	\$	
DC NO.						
VEHICLE 1 - OWNER'S NAME			VEHICLE 2 - OWNER'S NAME			
VEHICLE 1 - OPERATOR'S NAME			VEHICLE 2 - OPERATOR'S NAME			
WANTED/STOLEN MESSAGE SENT		DIST/UNIT	RECEIPT NO.	SENT BY		
General No.	Date	TERMINAL				
REPORT PREPARED BY		NO.	DIST/UNIT	TOTAL PAGES	PAGE NO.	
Ticino		2071	6	1		
REVIEWED BY		NO.	DIST/UNIT	REFERRAL DATE	GEN NO.	
Sgt. J		499	6A			
PURSUANT TO ACT 155 OF 1992, THE BELOW PERSON ACKNOWLEDGES RECEIPT OF THE NOTIFICATION OF VICTIM SERVICES FORM:						

EXHIBIT

PEN640 Doc 631-639

7/16/2000

42  
93

January 12, 2019

For your birthday HMC wanted to give you the  
gift of gratitude.

The pages that follow are a collection of projects HMC  
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HMC

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Sofitel Washington, DC - Lafayette Square

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Ravens Mt Bank Stadium Solidcore

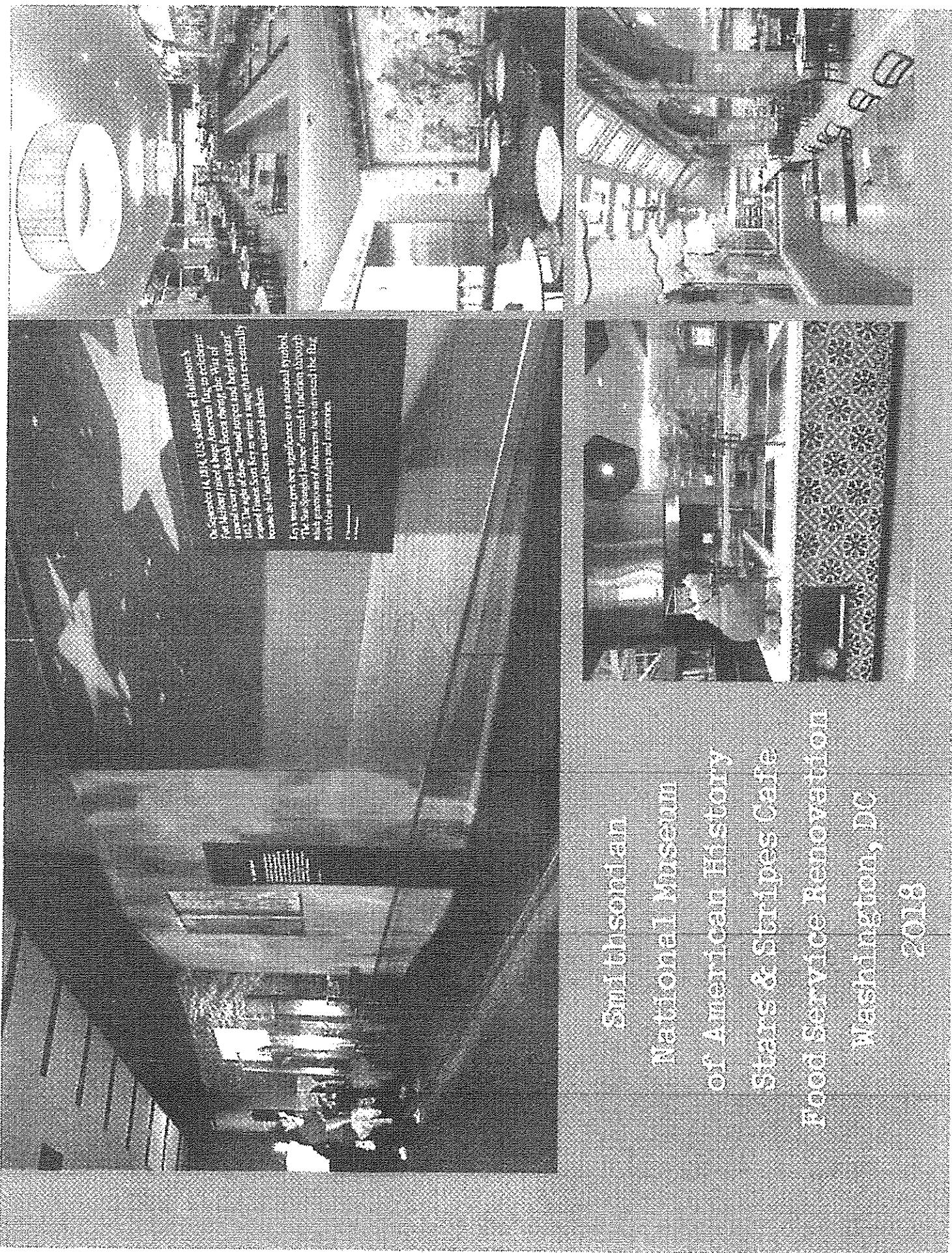
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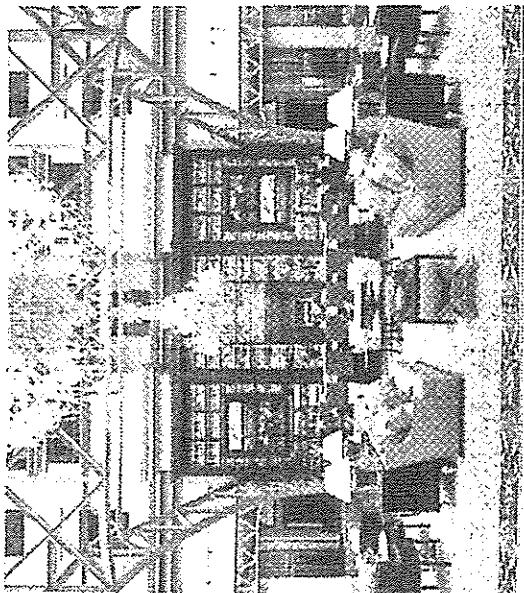
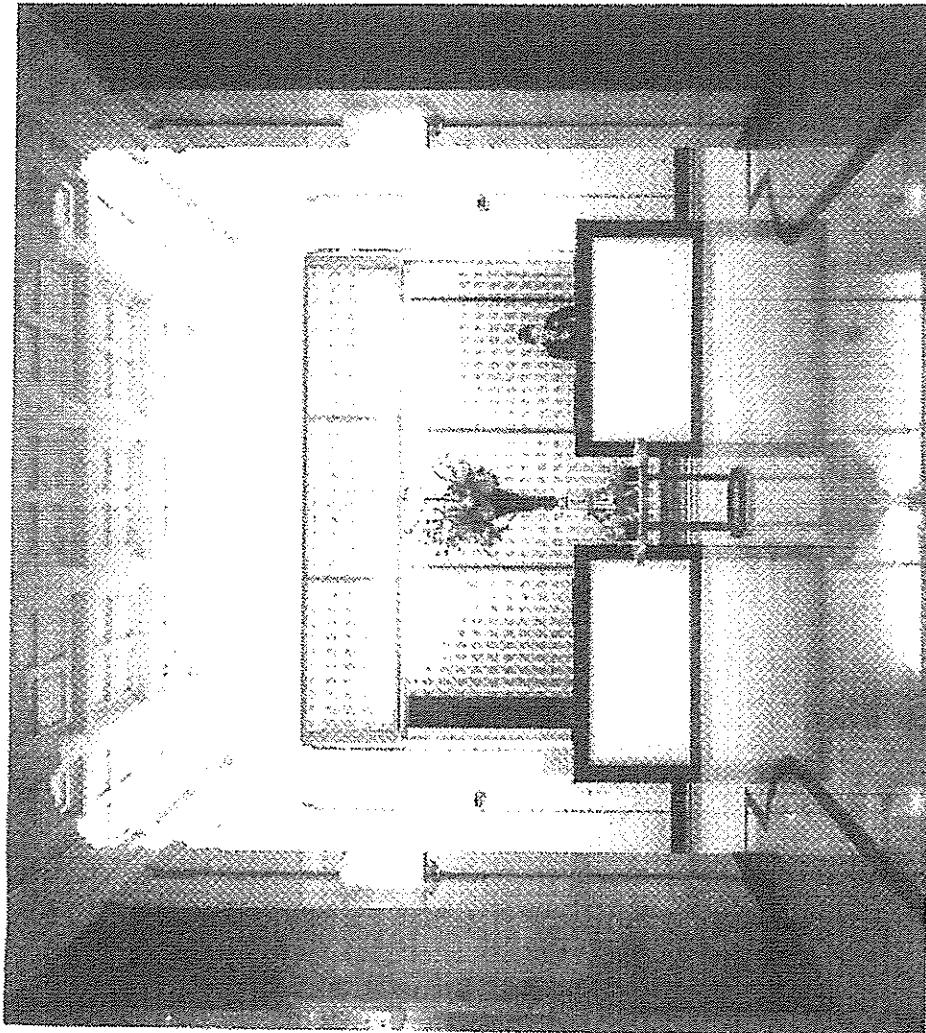
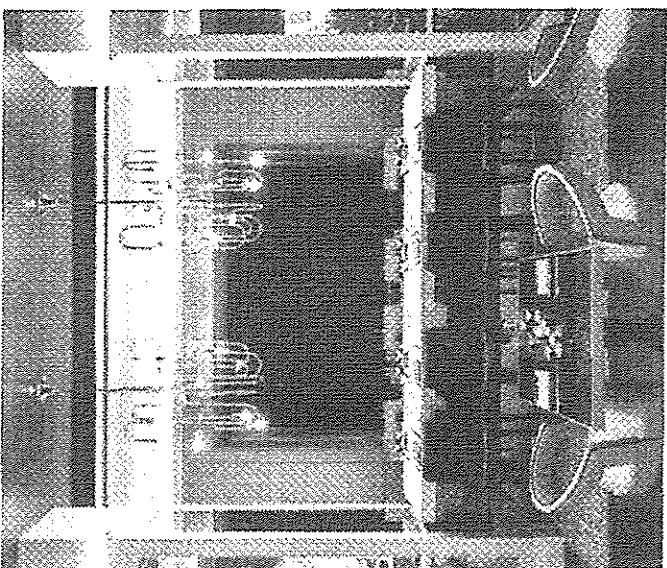
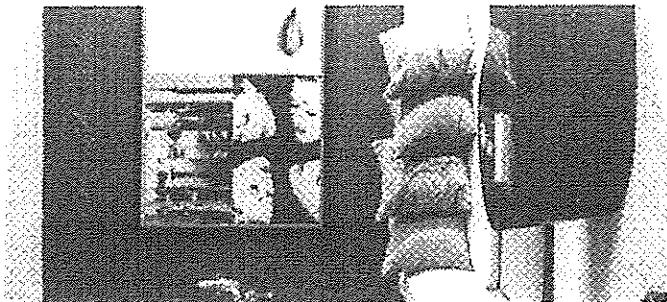
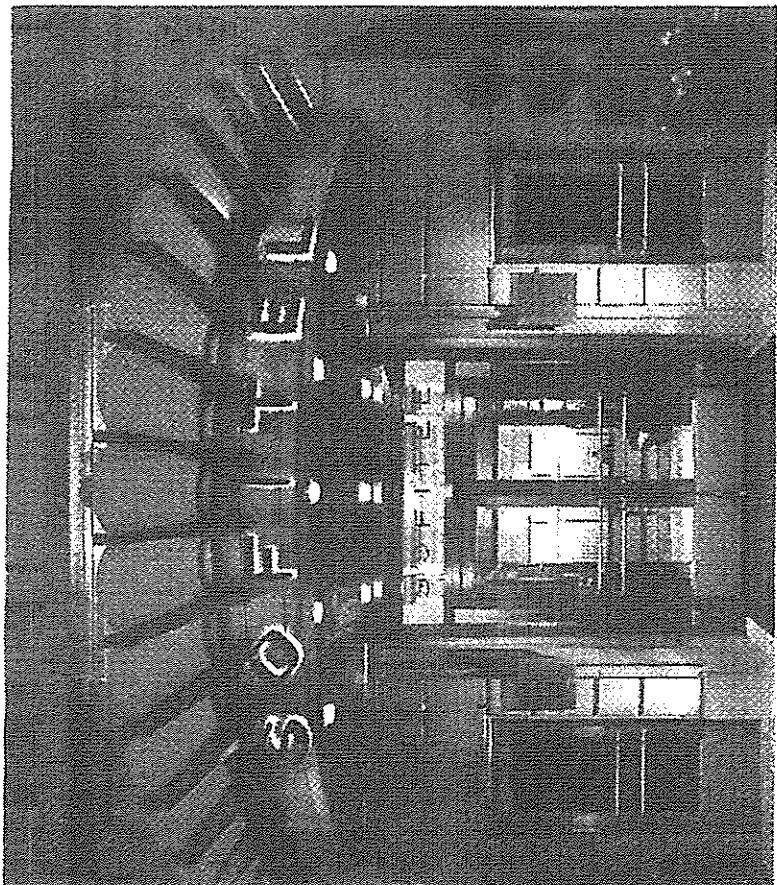
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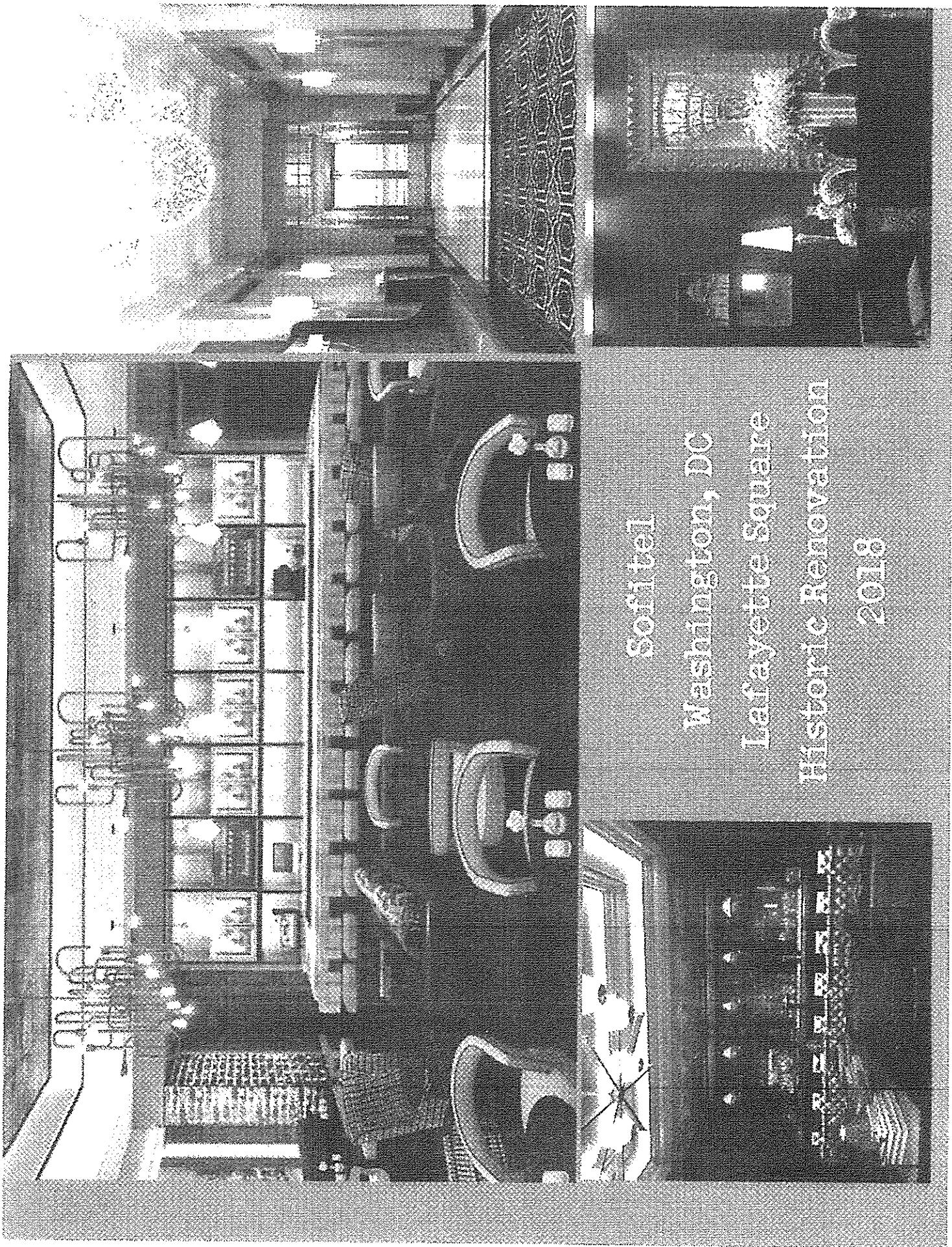
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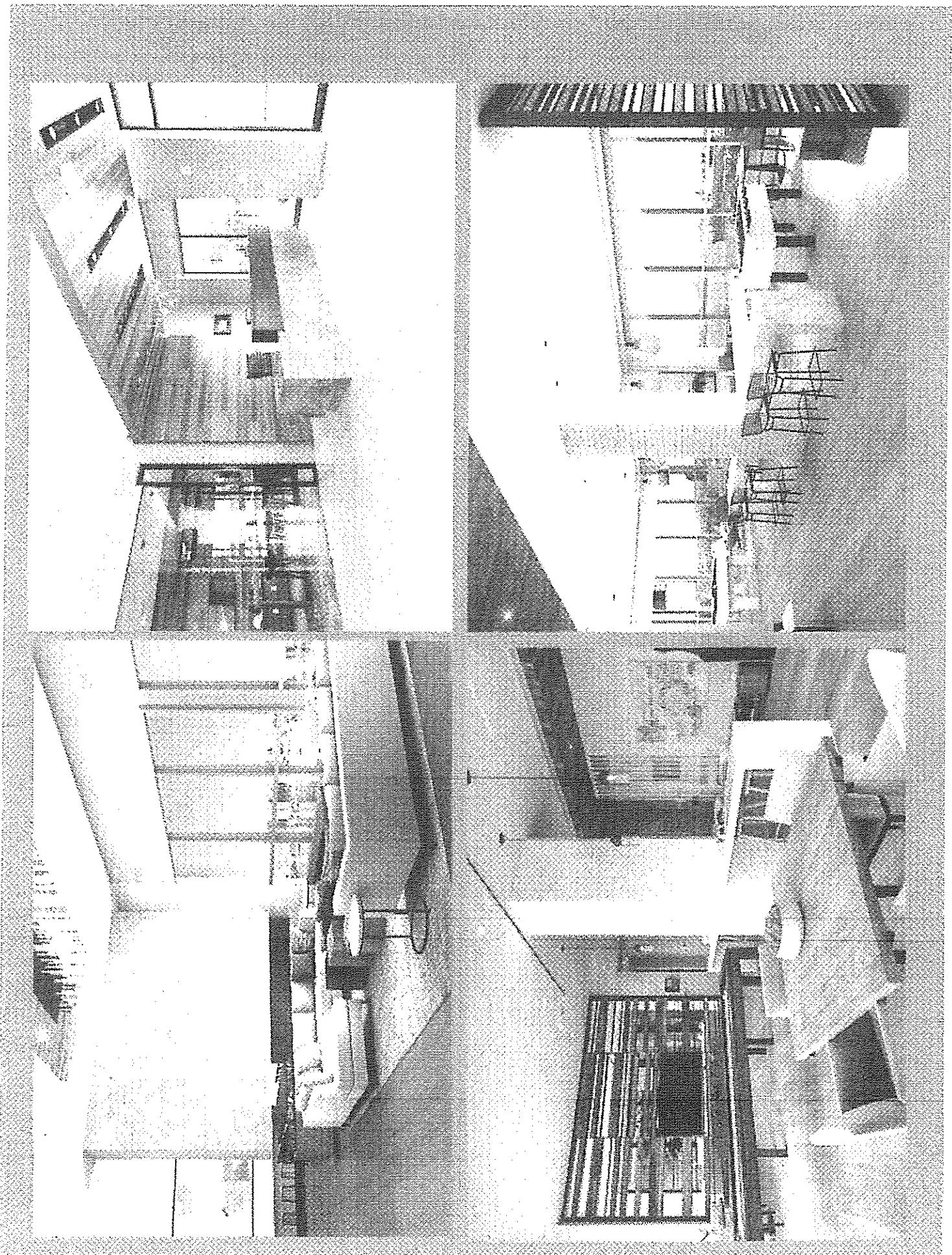
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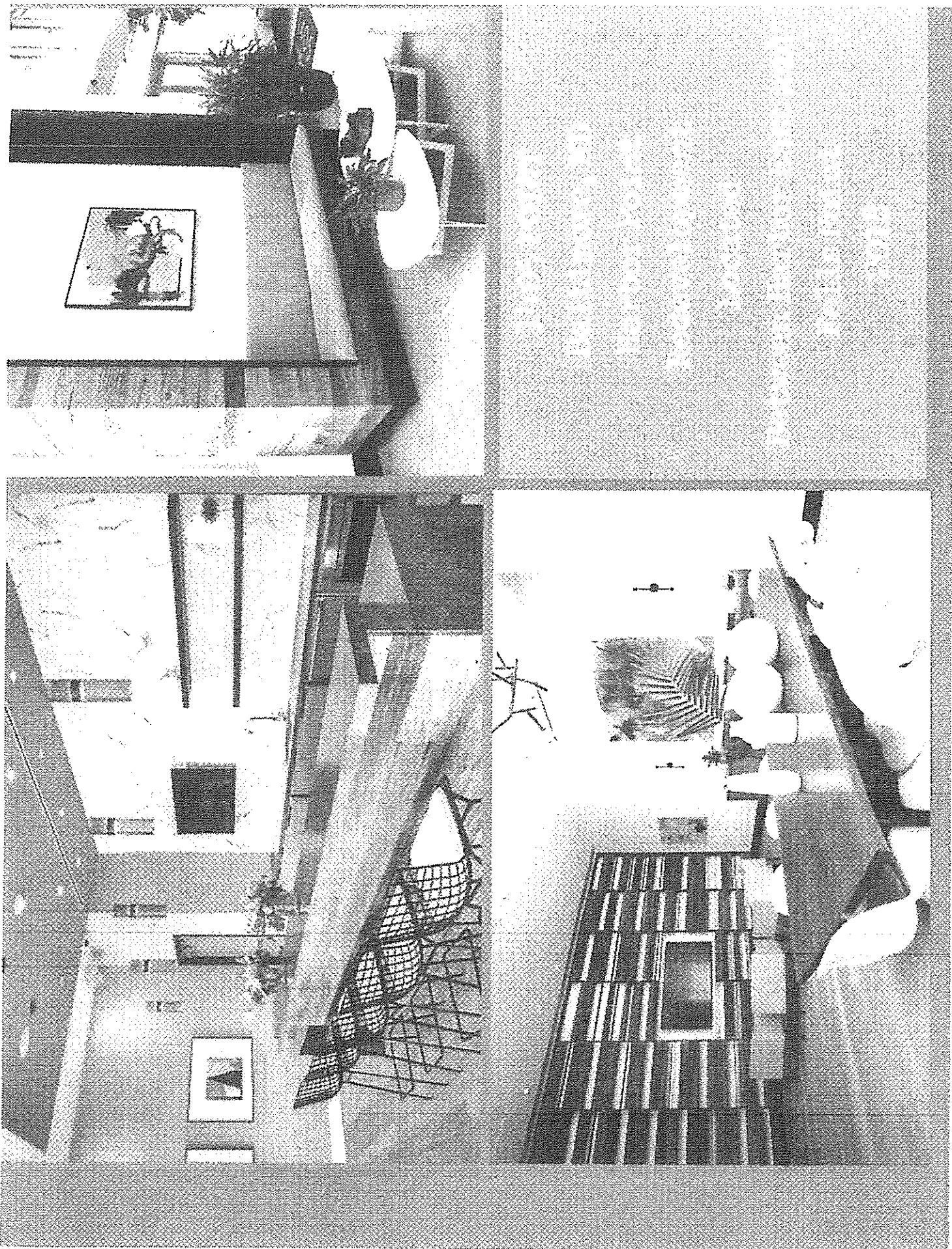
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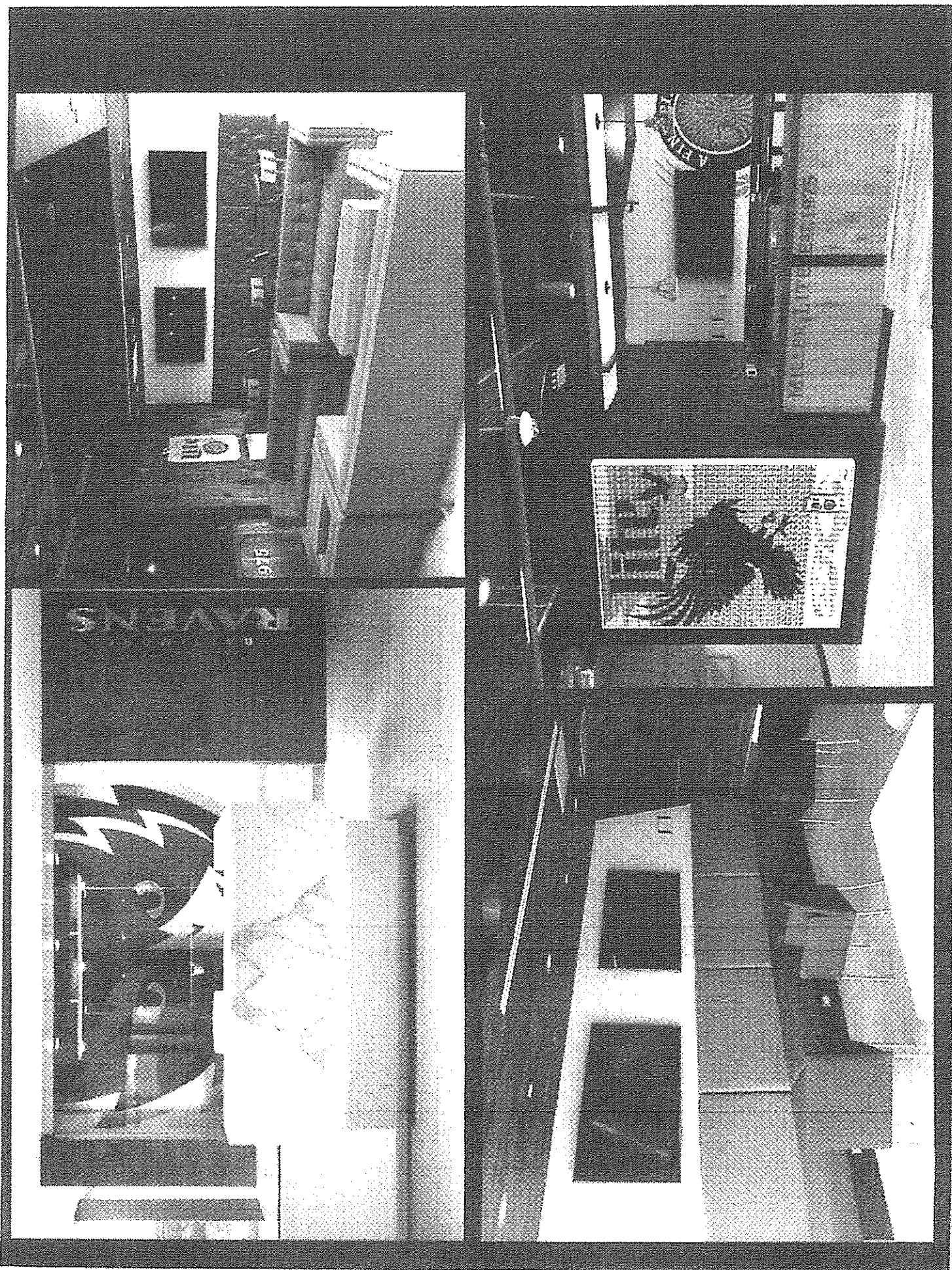










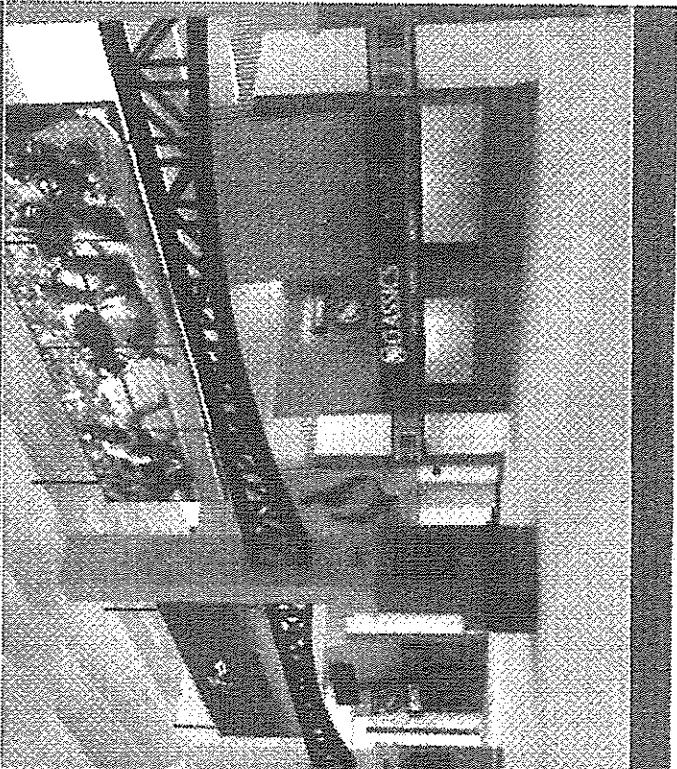


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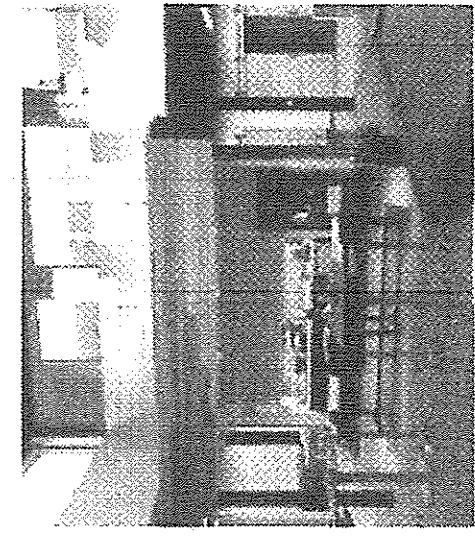
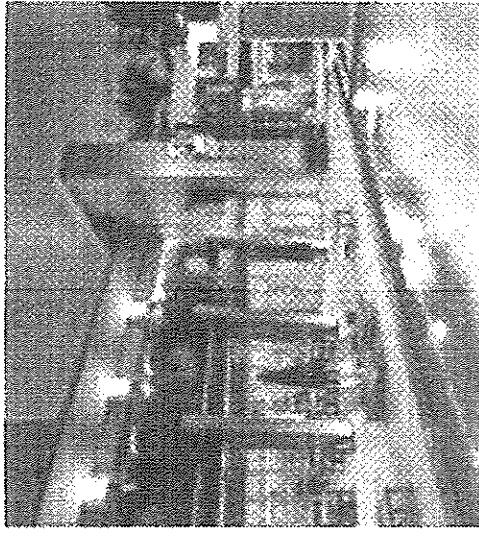
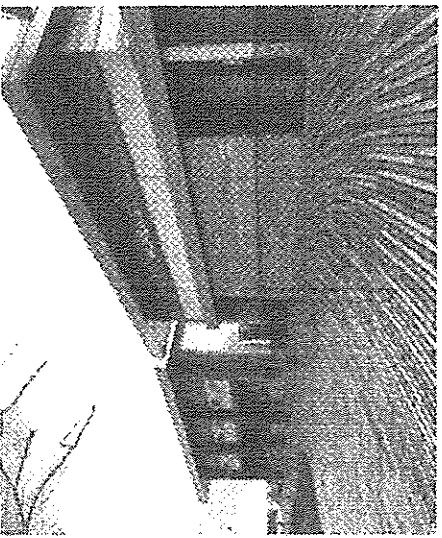
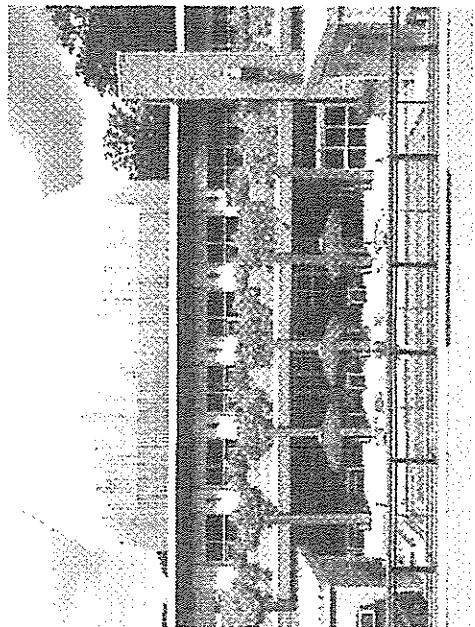
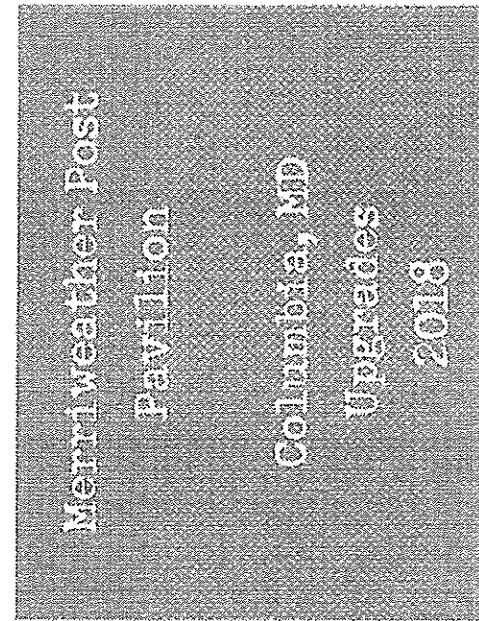
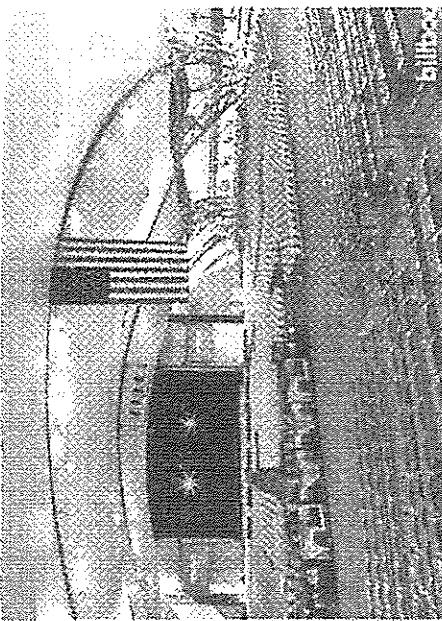
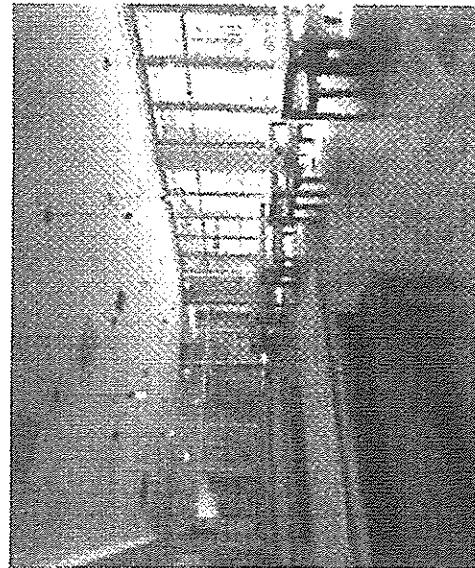
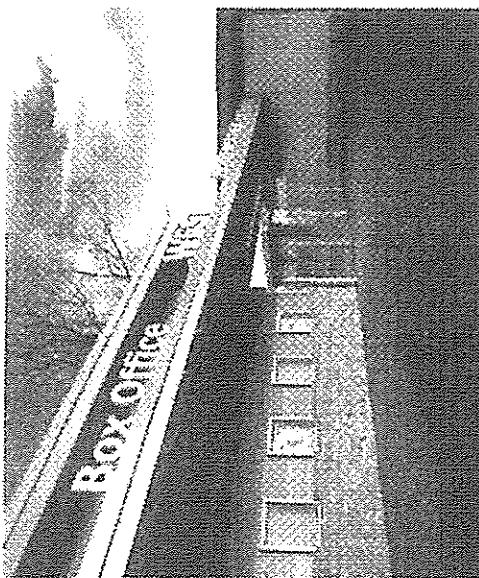
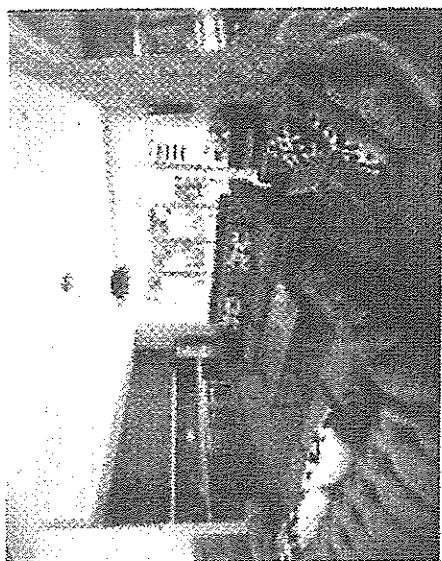
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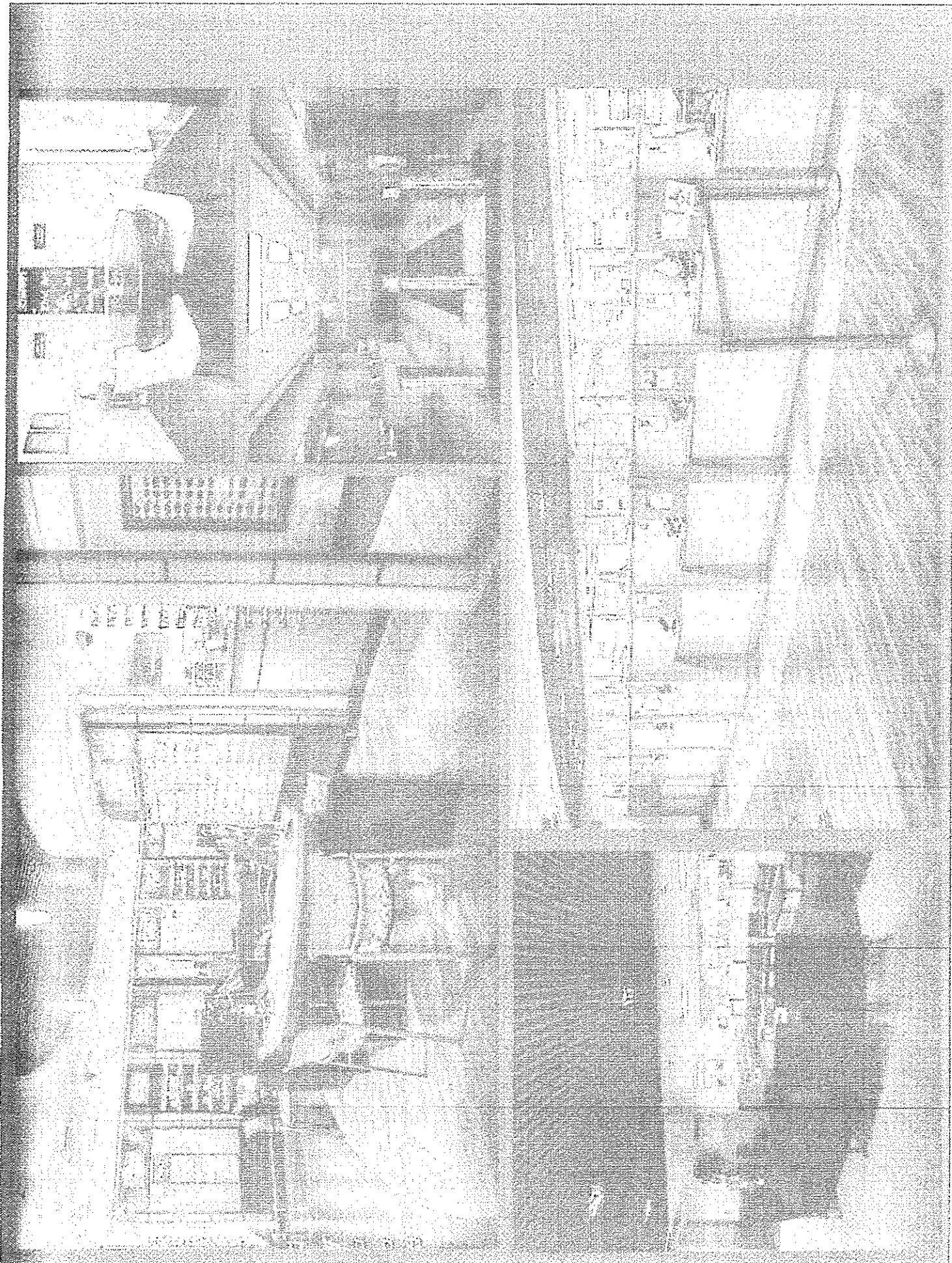
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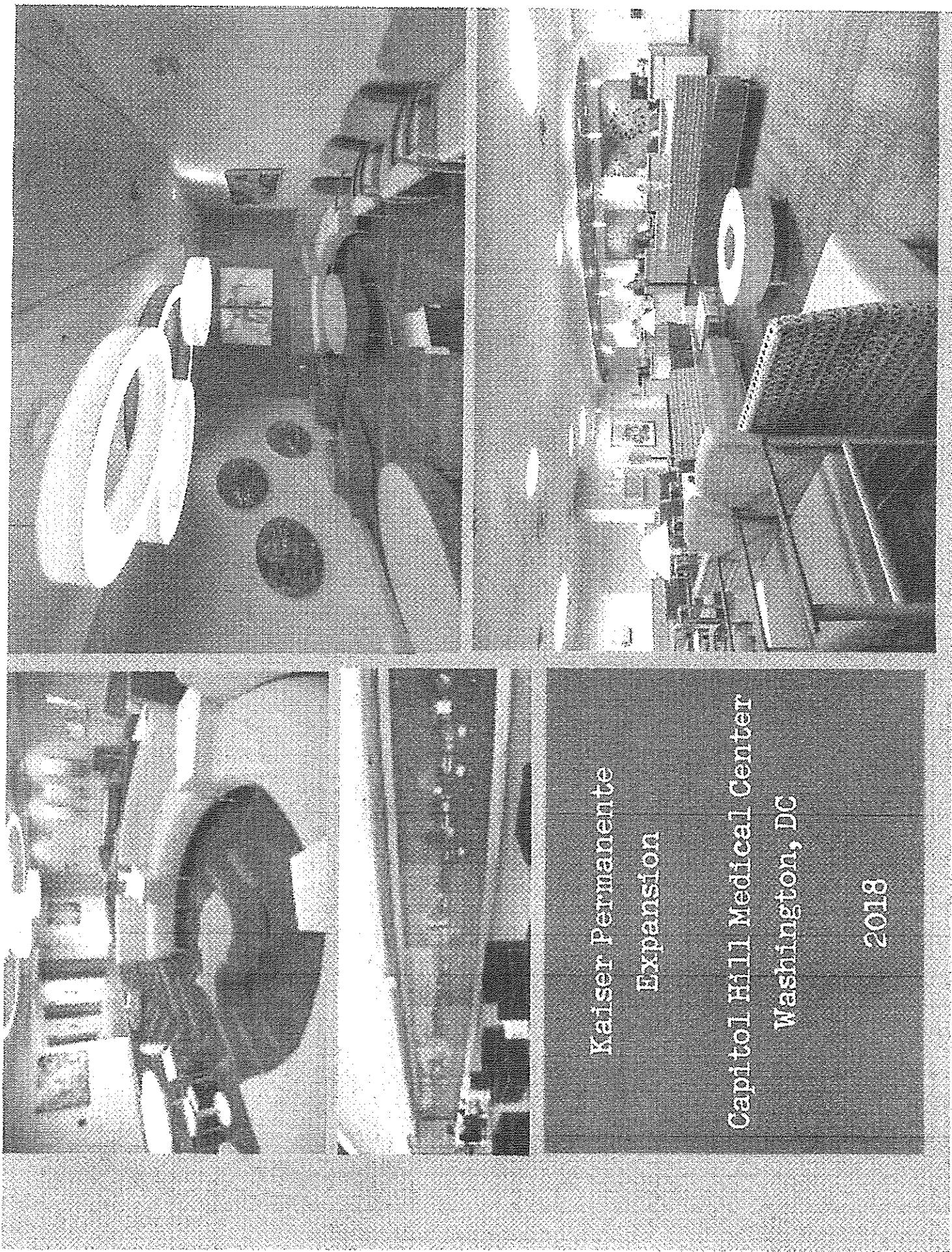
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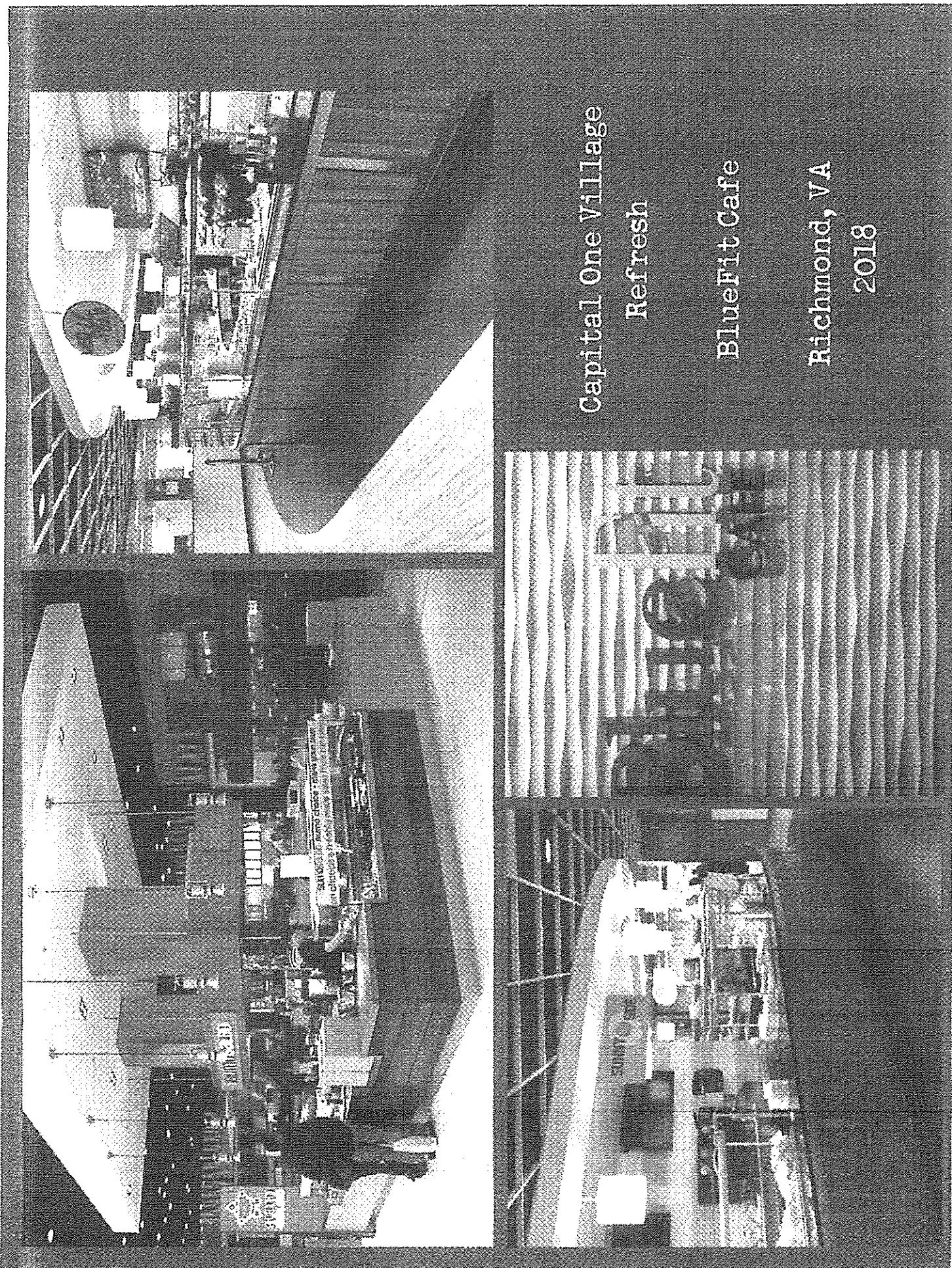




Kaiser Permanente  
Expansion

Capitol Hill Medical Center  
Washington, DC

2018



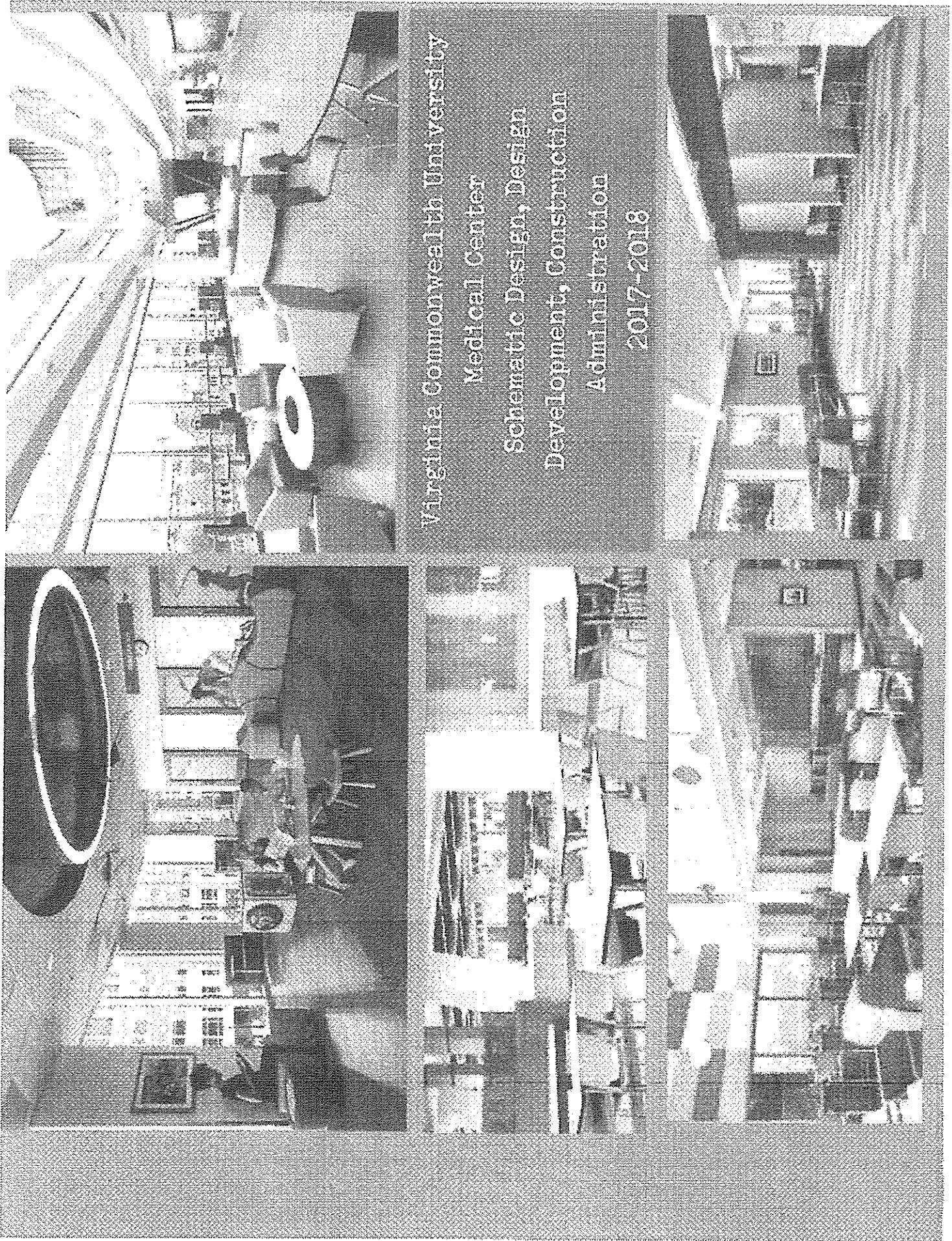
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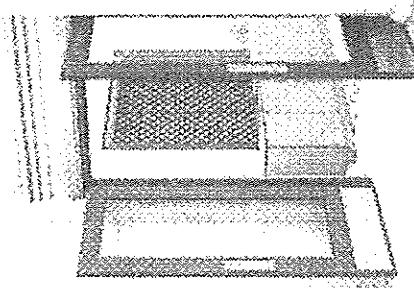
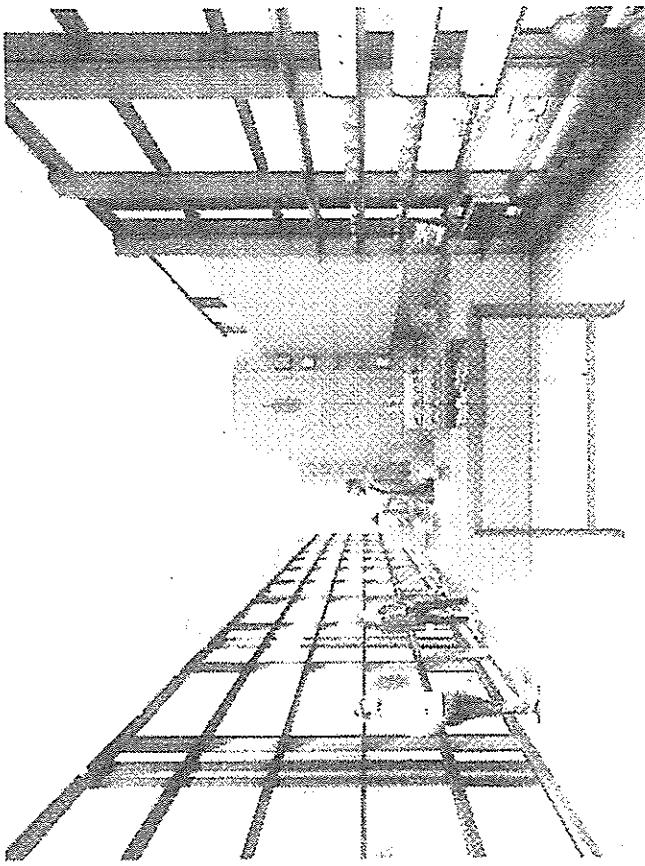
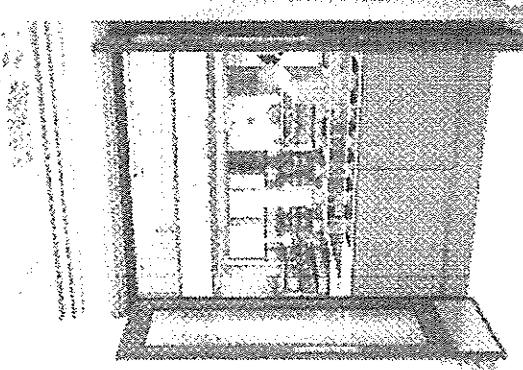
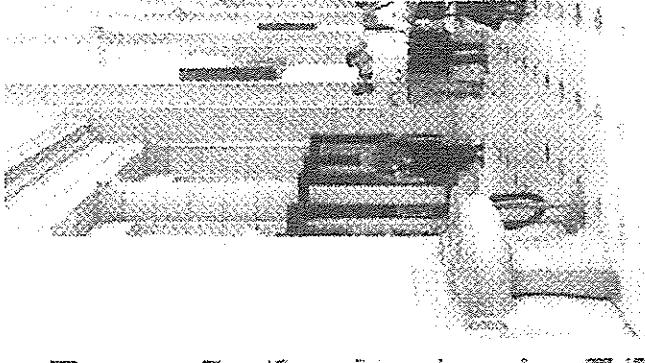
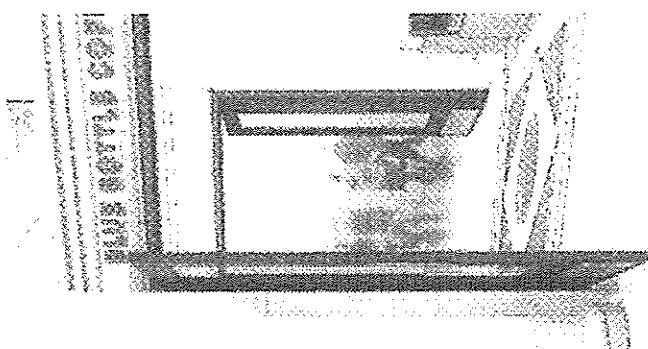
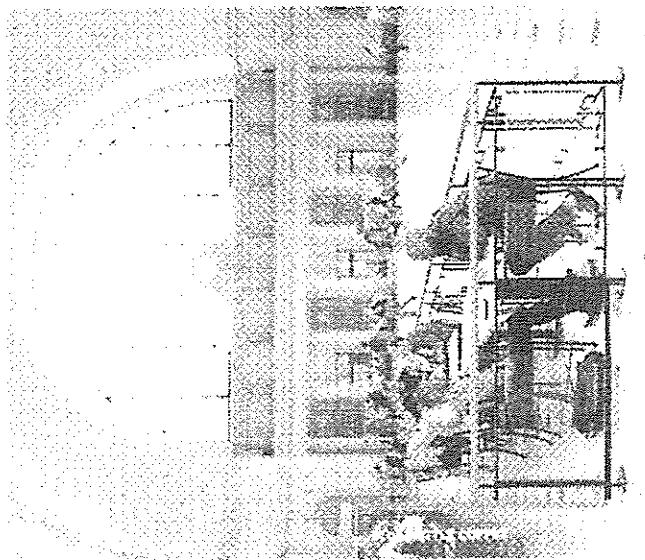
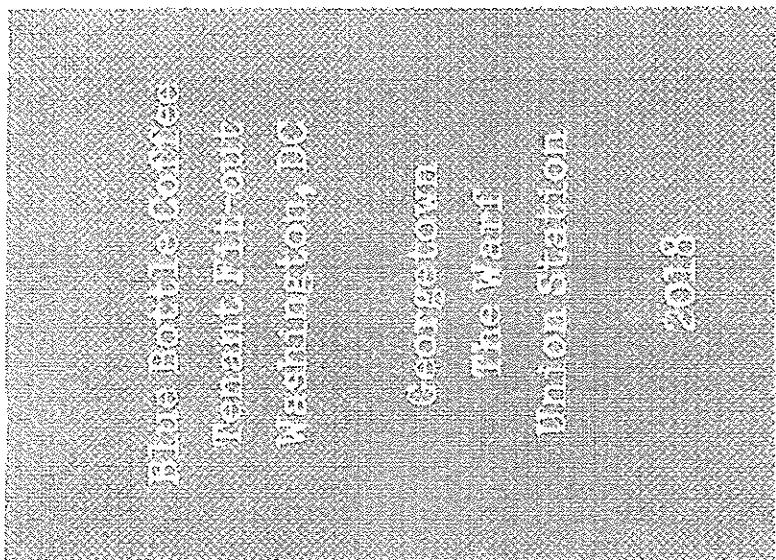
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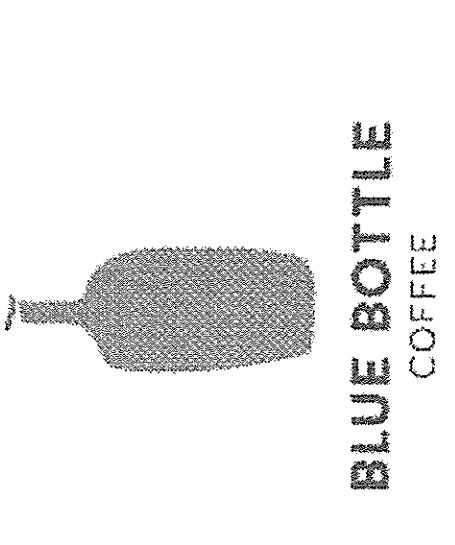
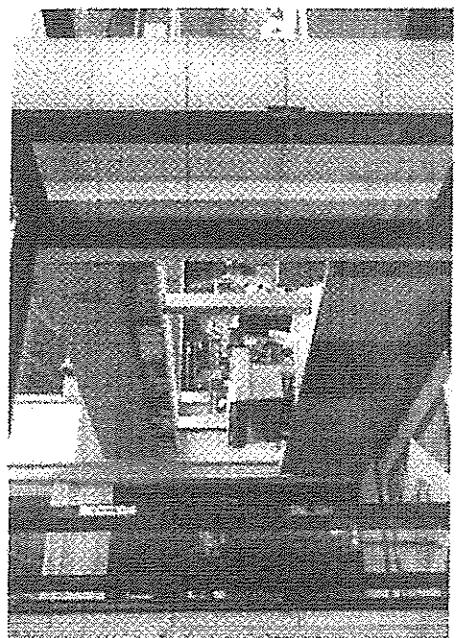
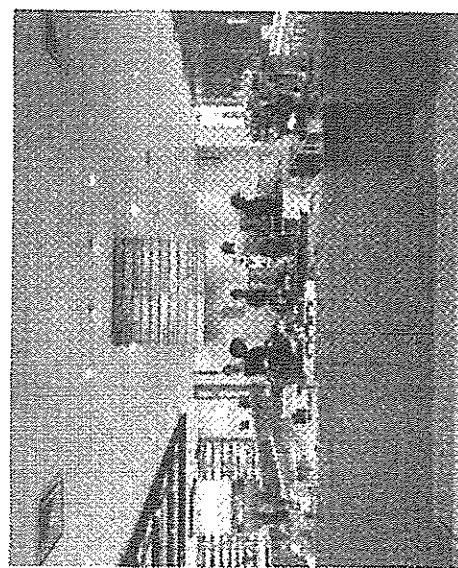
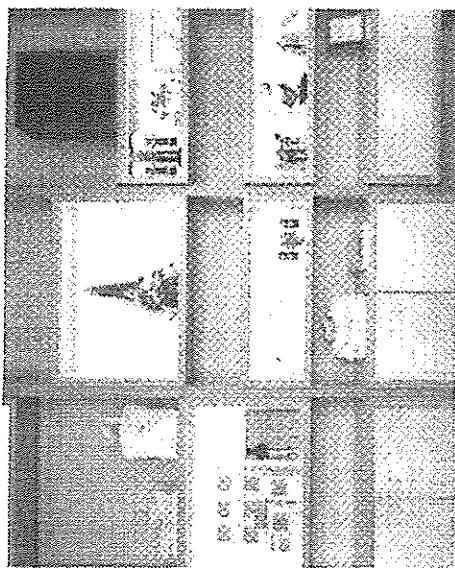
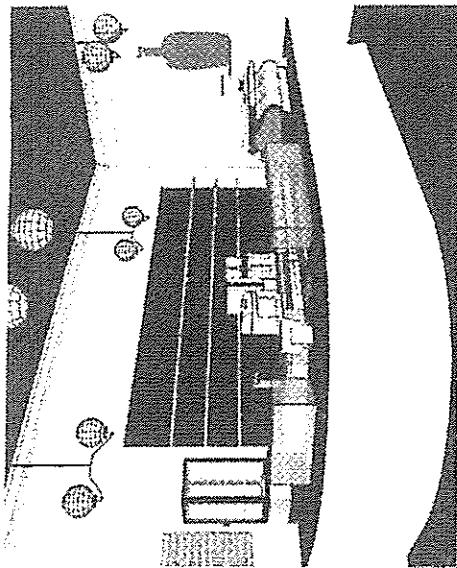
Development, Construction

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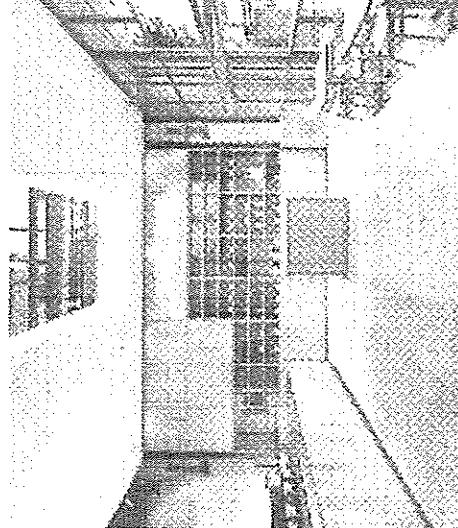
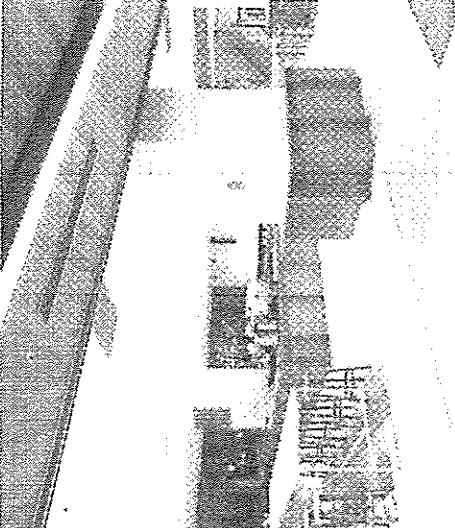
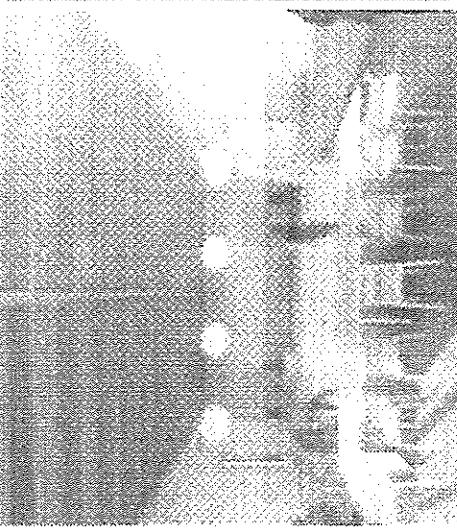
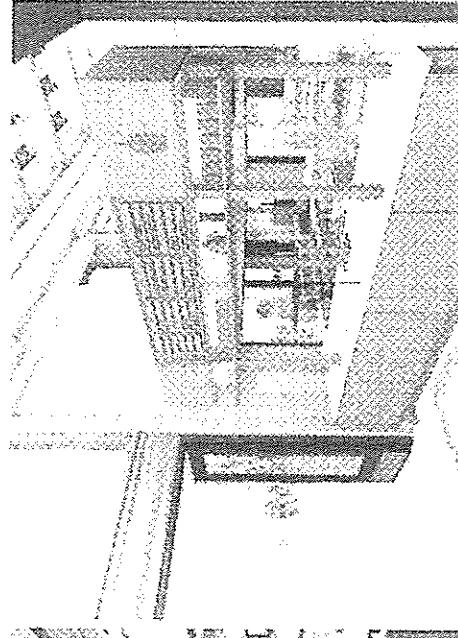
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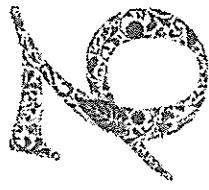


BLUE BOTTLE  
COFFEE



DOCKING ORGANIC AND INORGANIC  
THE 2019 CAPRICORN HOROSCOPE

BY JEFFREY BROWN



Capricorn Horoscope 2019: New Heights May Begin to Actualize for You. It seems that you are lucky and fortunate for most of the year. If you have any of your long-term plans waiting, or thinking to initiate something new, hold on that for a while because Saturn and Uranus will meet in a harmonious setting, in the second half of the year which is likely to give wonderful results in August and September. Sky is the limit and there are chances for you to achieve new heights and set remarkable standards, so says your Capricorn horoscope 2019.

Jeffrey A. Brown

Jeffrey A. Brown

YOU'RE  
A WHOLE LOT  
OF LOVE!